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TENNESSEE
GAS PIPELINE
an El Paso Energy company

DEPT OF TRANSPORTATION

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June 22, 2000

Administrator
Office of Pipeline Safety
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: Docket No. RSPA-99-6355; Notice 3 - 58
Pipeline Safety: Pipeline Integrity Management in High Consequence Areas

Dear Sir:

Tennessee Gas Pipeline is one of the country's major transporters of natural gas. Through our various systems we operate approximately 15,000 miles of gas transmission pipelines. All of these miles of pipeline are subject to the direct regulation of the Research and Special Programs Administration (RSPA) as embodied in Title 49 Code of Federal Regulations Parts 190, 191, 192, 193, and 199. Tennessee Gas Pipeline receives gas primarily from Canada, south Texas, south Louisiana, the Gulf of Mexico, and the mid-continent regions, and deliver gas to the major population centers of the midwestern, southern, and eastern parts of the United States.

Tennessee Gas appreciates this opportunity to provide the following comments regarding the development of pipeline integrity rules in high consequence areas for hazardous liquid pipelines with mileage in excess of 500 miles. Following are our comments to the *Federal Register* notice dated April 24, 2000, concerning the referenced docket.

1. Hazardous liquid pipelines and natural gas pipelines are different. Repeatedly throughout the Notice the term "pipeline" is used. The Office of Pipeline Safety (OPS) should clearly differentiate between the two mediums. Examples of differences which would affect a pipeline integrity rule would include:
   a. Almost all hazardous liquids are heavier than air when released and travel in a cloud to low areas; natural gas is lighter than air and dissipates rapidly into the atmosphere.
   b. Most hazardous liquids present environmental hazards when released onto or into the ground; natural gas does not.
   c. Hazardous liquids have many different flash points resulting in many different characteristics when released; natural gas is a single medium and is very predictable upon release.

2. Pipeline flaw detection practices are different. Due to the differing physical characteristics between hazardous liquids and natural gas, the ability to detect certain flaws through common methods, such as electronic in-line inspection, is different. The proposed hazardous liquid rule relies heavily on in-line inspection in the evaluation of the respective pipeline. This approach would not be appropriate for natural gas pipelines. Operators of natural gas pipelines use a variety of methods, including in-line inspection, hydrostatic testing, and direct assessment, to evaluate the integrity of pipelines. OPS should not limit the use of proven effective tools in favor of a particular tool.

3. The proposed rule does not have a requirement for a cost-benefit analysis. The Accountable Pipeline Safety and Partnership Act of 1996 requires that an analysis must be performed on certain rulemakings and prescribes standards for such an analysis. While we are not in a position to comment on the cost implications of this proposed rule as it applies to hazardous liquid pipelines, we believe the "Framework for Office of Pipeline Safety Cost-Benefit Analysis" should be used in conducting any analysis.

4. The proposed rule does not identify performance measures or expected pipeline safety improvements. Any rulemaking should identify the performance measures by which the effectiveness of the proposed rule is measured. Identified performance measures should focus on a reduction in the number of reportable incidents, fatalities, injuries, and property damage in high consequence areas. To a lesser degree, and to the extent it can be quantified, any associated increase in public confidence should be included in the performance measures, as well.

5. The timing of the proposed rule should accurately reflect the physical capabilities of the affected operators to comply. We believe that the hazardous liquid operators' systems are to a large extent piggable by in-line inspection tools. This is not true for many natural gas pipeline systems. Any integrity rule should carefully consider the dates for completion of the baseline assessment and completion of the applicable integrity standard. These dates should be keyed to completion dates of these tasks, not arbitrarily selected or tied to unrelated events.

6. The proposed rule does not have a requirement for a review of its effectiveness in meeting the performance measures. The Office of Pipeline Safety should establish a date by which a formal cost-benefit analysis be performed to determine the effectiveness of this proposed rule. This would ensure that resources would not continue to be allocated to comply with a rule which may not be serving the purpose with which it was intended, if the analysis showed that the proposed rule was not cost-beneficial.

7. The proposed rule should utilize the most effective practices, not "best industry practices". The use of the term "best industry practices" is vague, difficult to defend, and is potentially a moving target depending on the interpreter. The Office of Pipeline Safety should specify in performance language that each operator use the practices most effective for that particular system, and consequently have the operator comply with the rule. An alternative to this would be to define within the rule "best industry practices" to be those practices which have been demonstrated to be effective for the application.

Tennessee Gas Pipeline appreciates the opportunity to comment on this rulemaking. We look forward to working with the Office of Pipeline Safety on the pipeline integrity rulemaking for natural gas pipelines.

Sincerely,

Daron K. Moore